## **DECLARATION**

- I, Alexander Cohen, pursuant to U.S.C. §1746, hereby declare as follows:
- 1. I am above the age of 18 and am of sound mind.
- 2. I have done Winter Outreach in the City of St. Louis for four years now. I also am a disaster relief worker. As part of Winter Outreach, I help people access shelter on cold winter nights. For those who do not want to seek shelter, I meet them where they are, and provide blankets, hand warmers, clothes, and other items they may need to stay warm.
- 3. As part of Tent Mission, I have been working with other outreach volunteers to provide meals, tents, tarps, and other supplies that people need to try and survive the current health pandemic.
- 4. I have also been actively involved in helping people sign up for shelter space. In particular, I have been using the City's Google Form intake process, which they created in recent weeks in order to supposedly help people access shelter beds that are coming on line.
- 5. Outreachers were informed that this process is the City's way of prioritizing shelter for the most at risk, because they do not currently have adequate shelter space for all unhoused individuals.
- 6. Over the past few weeks, I have signed up dozens of people for shelter through the City's Google Form intake process.
- 7. Every day, I have people come up to me, that I personally signed up, asking me about the status of their application.
- 8. I have signed people up at encampments across the City, including those located near Market Street.

- 9. When I try to follow up with City officials about the status of an application and get answers for the people I helped sign up, it is nearly impossible to get a hold of anyone and receive an update about that particular applicant.
- 10. During calls with City officials, we have been told that outreachers should stop acting like "their person"--meaning someone they helped sign up--is most important because this is the City's prioritization process.
- 11. If the City had enough beds for everyone who wanted them, there would be no need to prioritize individuals.
- 12. This reality is frustrating because the Mayor's office has conveyed to the public that there are beds for everyone, but the reality on the ground is that people are waiting weeks to be placed in beds, if they are placed at all.
- 13. After Chief Hayden issued his directive instructing officers not to disband encampments per CDC guidelines, unhoused individuals in the City began asking outreach workers for tents because they did not have shelter and they wanted to have a location where they could shelter in place.
- 14. In response to these requests, Tent Mission started collecting tents so that people who wanted to shelter in place would have a place to go.
- 15. On April 4, 2020, we began distributing tents for people who requested them. After we dropped them off, unhoused individuals put the tents up where they felt most safe.
- 16. For years, police had told individuals that if they went to 14th and Market they would not be arrested, so a group of people who had been living there and nearby set up tents there, believing they would be safe.

- 17. A second group of mostly women felt safest by City Hall and the police cameras located near Tucker and Market. This camp became known as the family camp.
- 18. On April 6, 2020, I drove by the family camp after dropping off food and noticed a bike cop in the camp without a mask. I pulled over and went to go talk to him.
- 19. During that visit to the family camp, everyone at the camp told me that that morning they had been told by officers that they had to leave the camp by Friday.
- 20. When I walked up to the officer, I began filming him. The officer changed his tune and said, "I am not ordering you to do anything, that was what *they* said this morning."
- 21. I also spoke with other officers nearby that same day, and they told me that they were trying to get everyone to move to 14th and Market.
- 22. They also told me that they would be relocating the handwashing stations and port a potties from Tucker and Market to 14th and Market, so that people would be encouraged to go there.
- 23. After police attempted to evict the 14th and Market encampment at 4:00 a.m. on April 9, 2020, it seemed like the City was not going to try and evict the encampment again.
- 24. On April 29, 2020, I arrived at the Market encampments around 10:00 a.m. to do my regular outreach.
- 25. Around 2:00 p.m. on April 29, many City officials showed up at the encampments, going tent to tent telling people they would have to leave by Friday at 10:00 am, and then zip tying Orders to Vacate to their tent polls.
  - 26. This notice provided people less than 48 hours to try and find a safe alternative.

27. It is disheartening to me that the City is threatening people living at the Market Street encampments, who are trying their best to prevent the spread of COVID-19 in their community with the limited resources they have, when I personally know that there are still many people living near Market Street that have sought shelter yet have been unable able to access a bed.

28. During a phone call today, April 30, 2020, with the Mayor's Office and Dr. Echols, multiple people asked whether police would be present at any point during the removal of residents from the encampments on Market street, and we were not given a clear answer as to whether police would be present at any point.

29. When asked further regarding whether police would be present, we were told by the Mayor's representative that we should ask the Mayor directly.

Under the penalty of perjury, I declare the above listed statements to be true and accurate.

April 30, 2020
Alexander Cohen
Date